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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

**MOTION TO WITHDRAW AS COUNSEL
OF RECORD**

*V.B. vs. Uber Technologies, Inc., et al.,
3:25-cv-06705;*

*M.W. vs. Uber Technologies, Inc., et al.,
3:25-cv-05474; and*

*E.B. vs. Uber Technologies, Inc., et al.,
3:24-cv-07491*

Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an Order allowing his firm to withdraw as counsel of record in the above-captioned matters.

In response to a meet and confer with opposing counsel on August 21, 2025, Counsel reviewed the alleged “non-bona-fide receipts” that Plaintiffs previously provided to Counsel. Relying on Defendants’ representations, Counsel personally contacted the above-referenced Plaintiffs via email later that afternoon. Counsel informed Plaintiffs of Uber’s concerns and requested that Plaintiffs provide any additional proof of their ride at issue, *e.g.*, the summary

1 email that Uber typically sends upon ride completion. In response to Defendants' additional
2 show cause motion (ECF 3784), Counsel followed up with the above-referenced plaintiffs via
3 telephone and email on August 29, 2025. On September 2, 2025, Counsel also mailed letters
4 via 2-day Federal Express giving Plaintiffs until September 9, 2025 to provide any additional
5 proof otherwise Counsel would initiate the process of withdrawing as their attorneys. At the
6 time of filing this motion to withdraw, no additional ride receipt proof has been provided by the
7 above-referenced Plaintiffs nor substitute counsel identified.

9 Additionally, during the aforementioned meet and confer zoom on August 21, 2025,
10 Counsel advised opposing counsel at Shook, Hardy & Bacon of his firm's intent to withdraw
11 should the above-referenced Plaintiffs fail to provide additional ride receipt proof. As required
12 by Local Rule 11-5(a), Counsel has provided written notice of Counsel's intent to withdraw,
13 reasonably in advance, to the above-referenced Plaintiffs as well as opposing parties.

15 WHEREFORE, the attorneys and law firm of Pulaski Kherkher, PLLC respectfully
16 request that they be allowed to withdraw as counsel of record for the above-referenced Plaintiffs.
17 A courtesy copy of this motion will be served upon Plaintiff at their last known address and via
18 electronic mail.

19 Dated: September 10, 2025

Respectfully submitted,

PULASKI KHERKHER, PLLC

/s/ D. Douglas Grubbs

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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2025, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: ubermdlservice@listserv.shb.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs